

**DECLARATION OF LEILA REZANAVAZ**

I, Leila Rezanavaz, under penalty of perjury, declare the following:

1. I am a Telecommunication Electrical Engineer and employed by the firm of Lukas, Nace, Gutierrez & Sachs, LLP.
2. I graduated from George Mason University, Fairfax, Virginia, with a Bachelor of Science degree in Electrical and Computer Engineering in 1989.
3. I have been retained by Bluegrass Cellular, Inc. ("Bluegrass") to review and comment on the Petition for Expedited Rulemaking and Request for Waiver filed by AT&T Services, Inc. ("AT&T") on February 29, 2012, asking the Commission to (i) conduct an expedited rulemaking, and (ii) waive Section 22.913 of the Commission's rules, to permit the use of a Power Spectral Density ("PSD") model to replace the Effective Radiated Power ("ERP") for power limits for cellular base stations.
4. As shown on the attached **Exhibit 1**, Bluegrass is the Licensee in CMA445B (KNKN867), CMA446B (KNKN795), and CMA447B (KNKN814) and AT&T is the Licensee in some of Bluegrass' neighboring markets. Bluegrass has employed CDMA technology to provide voice and data services in its cellular markets.
5. FCC grant of a waiver of Section 22.913 of the Commission's rules will enable AT&T to start operating at higher power levels almost immediately, which will cause disadvantages for Bluegrass and its customers. Since AT&T and Bluegrass have several neighboring sites in each of their neighboring markets, and co-locate at one tower on the border between CMA445B and CMA037B, increasing power by AT&T at the base stations adjacent to Bluegrass' neighboring sites will cause potentially harmful interference in Bluegrass' markets. The AT&T base stations operating at higher power levels will cause stronger signals across the border into Bluegrass markets, which will increase the noise level in those markets. In CDMA (1XRTT and EVDO) networks, the Signal-to-Noise ("S/N") ratio is a critical factor in performance quality and system throughput. The stronger signals from AT&T sites inside Bluegrass' markets will cause reduction in the value of S/N ratio in Bluegrass' markets. This will result in reduced system coverage and capacity and compromised system quality and customer service. The stronger signals from AT&T's neighboring markets will cause harmful interference not only to the Bluegrass' CDMA downlink (base station to mobile) by increasing the noise level, but also to the CDMA uplink (Mobile to base station) as Bluegrass' mobile stations will power up upon seeing the strong signal from the neighboring AT&T market, which causes uplink interference as well.

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6. AT&T and Bluegrass have been operating in neighboring markets with signals balanced on the border areas. They have consented to each others' Service Area Boundary ("SAB") extensions using the 32 dBu contours that have been determined based upon the methods prescribed by Section 22.911(a)(1) of the Commission's rules. The Power ("P") value used in that formula is the base station ERP. If PSD replaces the ERP in limiting base station power, a new method will be needed for establishing SAB, CGSA, and SAB extensions into neighboring markets and that method is not currently in place.
7. The above statement is true and correct to the best of my knowledge and belief.

  
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Leila Rezanavaz

Dated: May 31, 2012